1		DIRECT TESTIMONY
2		OF
3		JULIUS A. WRIGHT
4		ON BEHALF OF
5		SOUTH CAROLINA ELECTRIC & GAS COMPANY
6		DOCKET NO. 2002-223-E
7		
8 9		I. INTRODUCTION
10		
11	Q.	PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS
12		ADDRESS.
13	<b>A</b> .	Julius A. Wright, President, J. A. Wright & Associates, Inc., 4705 Ponte
14		Vedra Drive, Marietta, Georgia 30067.
15	Q.	BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?
16	A.	I am a consultant to regulated industries on issues related to economics,
17		economic modeling, regulatory policy, and industry restructuring. In this
18		docket I am testifying on behalf of South Carolina Electric & Gas
19		("SCE&G" or the "Company").
20	0	PLEASE DESCRIBES VOUR EDUCATIONAL AND

#### PROFESSIONAL EXPERIENCE.

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I received an undergraduate degree from Valdosta State College (BS A. 2 Chemistry); an MBA in Finance from Georgia State University; and a 3 Masters and Ph.D. in Economics from North Carolina State University, 4 where I focused on regulatory and environmental economics. Among 5 other past experiences, I served as a Commissioner on the North Carolina 6 Utilities Commission from 1985 to 1993. I am currently President of J. A. 7 Wright & Associates, Inc., a consulting firm that specializes in gas, 8 electric, and telecommunications regulatory issues. Over the past six years 9 I have dealt almost exclusively with electric and natural gas restructuring 10 issues focusing on strategies for dealing with the transition to competitive 11 markets. In this context, I have testified before regulatory Commissions 12 and legislative bodies, presented studies and authored reports on issues 13 related to restructuring, and I have been a guest speaker on restructuring 14 issues at the Bonbright Conference, other seminars, and at the Georgia 15 Institute of Technology. I have also made presentations on performance 16 based ratemaking and testified as an expert witness on a wide range of 17 issues including issues related to performance based ratemaking, gas 18 industry issues, and a variety of topics associated with transitioning from a 19

regulated to a deregulated marketplace.

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More recently, I was one of three economists engaged by the California State Auditor to examine the problems that led to that state's recent electric energy crisis. Furthermore, for the past two years I have worked with several utilities on the most effective way to reorganize transmission assets from both a business/marketplace structure and financial structure, while accommodating the Federal Energy Regulatory Commission's ("FERC's") transmission policies.

See Exhibit No. \_\_\_\_ (JAW-1) for additional details on my background.

# Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

- In this proceeding, the Commission will decide a number of issues From my perspective I believe that there are at least two decisions that the Commission is asked to make in this docket that will have broad-reaching effects on utilities and utility service in this State. These decisions are decisions:
- 1. Demonstrating its support for the environmental and reliability investments that the Company is being required to make in its integrated generation system.

2. Supporting the resolution of two critical franchise negotiations that the Company has completed with the Cities of Charleston and Columbia.

## 4 Q. COULD YOU ELABORATE ON THE FIRST POINT?

A.

The Company's financial, management and cost of capital witnesses have testified about the capital investments that the Company must make in the coming years to meet environmental, safety and reliability demands. They have testified about the importance that this rate decision will have on the Company's ability to raise debt and equity capital on reasonable terms. I fully concur in the conclusions that these witnesses have reached about these matters. I agree that a strong showing of financial support from the Commission is in the long-term best interest of SCE&G's customers because it will result in lower capital costs for electric service over the long term.

There is, however, an important regulatory policy issue involved here that has not been fully discussed. It involves the larger issue of what business model or electric utility organization will be supported by Commissions in the future.

## Q. PLEASE DISCUSS THIS UTILITY BUSINESS MODEL POLICY

#### ISSUE.

A.

South Carolina is fortunate to be served by three, integrated, investor-owned electric utilities. All three have a strong regional presence and deep loyalties to this State. SCE&G is unique even among this select group, because it is the only one headquartered in South Carolina and the only one without substantial operations outside the immediate region.

Not very long ago, the accepted wisdom of many utility "experts" was that integrated, single-system, locally-based electric utilities were dinosaurs. Those experts would have told you that the time had come when integrated utilities would be forced to divest themselves of some or all of their generation. New generation, they said, would only be built by merchant power plant developers. In addition, they believed that the electric industry would and should consolidate into five or ten mega-energy companies, all with global operations. There was no place in this new world, they believed, for an independent South Carolina-based utility company like SCE&G.

SCE&G has defied these predictions. It has not been absorbed into other utilities. SCE&G and SCANA have kept their headquarters in South Carolina. SCE&G has not hesitated to invest in new, non-merchant generation to serve its customers' needs. SCE&G has kept its existing

plants, and rather than divesting itself of its existing generation, has continued to invest substantial capital in maintaining and upgrading its plants.

In fact, to the extent this rate case is about any one thing, it is about the capital that the Company is investing in its generation so that it can continue to provide reliable electric service and meet the State's growing demand while remaining an integrated, South Carolina based electric utility. As the evidence has shown, the need for revenue to cover this investment, more than any other single reason, is the reason that the Company is requesting rate relief at this time.

For SCE&G to continue to operate as an integrated, locally based utility, I believe it must be able to demonstrate to investors that the Commission supports its continued financial health. For financial markets to have confidence in SCE&G and continue to invest in the Company, the Commission must assure investors that the Commission supports SCE&G's continued investment in its integrated, locally based electric utility systm. If that support is clearly stated, markets will continue to invest in SCE&G and will support the traditional utility service model it represents.

### Q. HOW CAN THIS COMMISSION DEMONSTRATE ITS

# CONTINUED SUPPORT OF THE COMPANY'S BUSINESS STRUCTURE AND ITS SERVICE RESPONSIBILITIES?

A.

One important way is by granting the Company's request for inclusion of full Construction Work in Progress ("CWIP") in rate base, including the amounts spent on the Jasper project through December 31, 2002. Including this increment of CWIP in rate base would be consistent with this Commission's earlier treatment of CWIP costs related to the Company's last generation project, the Cope Plant. This would indicate the Commission's consistent support of the Company's prudent investments in its integrated generation system. It would also show investors that they can expect the same general regulatory approach during this round of investment that the Company received during construction of the Cope Station in the early and mid 1990s.

Another strong indication of the Commission's support of the Company and the utility model it represents will be found in the return on investment that the Commission approves in this case. As Dr. Malkiel has testified, smaller companies like SCE&G are perceived as riskier than the mega energy companies and are at a disadvantage in raising capital on national markets. I would be concerned that were the Commission to set a

low cost of equity number for SCE&G in this proceeding, it would send an improper signal to Wall Street that in the long-run would drive up the cost of the Company's debt leading to higher costs for ratepayers.

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# 5 Q. PLEASE ADDRESS THE SECOND POINT CONCERNING THE 6 CHARLESTON AND COLUMBIA FRANCHISES?

For many years, issues concerning new and restructured electric franchises 7 Α. have been points of contention between SCE&G and the two largest 8 municipalities it serves, the City of Charleston and the City of Columbia. 9 Negotiations concerning these franchises have been protracted – lasting over 10 11 four years in the case of Charleston and a decade in the case of Columbia. Based on my conversations with the Company personnel involved in these 12 negotiations and my review of some of the documentation, these 13 negotiations were not only protracted, but were at times contentious and 14 public. 15

# Q. PLEASE DESCRIBE YOUR UNDERSTANDING OF THE ISSUES NEGOTIATED IN MOST FRANCHISE AGREEMENTS.

18 A. The relationship between a utility and the large municipalities where it

serves is complex and multifaceted. The principal document that governs

and defines that relationship is the operative franchise agreement. Such franchise agreements commonly involve many issues beyond the simple delivery of utility services. Issues as diverse as street lighting, tree trimming, access to public rights of way for construction, permitting of construction, dealing with requests for overhead to underground conversion, and issues concerning rights to serve in newly incorporated areas are often included in franchises.

In addition to these issues, before the franchises with Columbia and Charleston were negotiated, there were other difficulties in the Company's relationships with those cities. For example, I am informed that in Charleston, the relationship was clouded by the fact that the City was reluctant to recognize SCE&G's service rights on Daniel Island. Daniel Island was annexed into the City when it became connected to urban Charleston by the construction of the Interstate 526 bridges. Its annexation brought into the City a single undeveloped tract of land larger that the existing Charleston Peninsula. A protracted dispute over service rights to this area would not have been in the best interest of the Company, its customers, the City, developers and landowners on Daniel Island.

In Columbia, the relationship between the City and the Company had

been clouded by the City's publicly announced decision to pursue municipalization of SCE&G's system. At one point in the process, the City hired a nationally-recognized consulting firm specializing in such projects, and held workshops and meetings to discuss proceeding with a municipalization initiative in Columbia.

Α.

These many different issues were part of the negotiations with these two cities and could only be resolved through a new franchise agreement. In addition, both cities saw an historical link between their electric franchises and transit service. Both cities insisted that the cost of a new electric franchise would have to include funds to assist in moving transit services into public hands.

# Q. DO YOU THINK THE FRANCHISE AGREEMENTS THE CITIES AND THE COMPANY HAVE REACHED ARE REASONABLE AND PRUDENT?

Yes. In both cases, there were long and arduous negotiations, but the Company was ultimately able to obtain comprehensive, long-term franchises with both cities. As with most franchise agreements these franchise agreements, came at a price, but in total, I believe the agreements to be reasonable for several reasons. Specifically, both franchises are for 30 year

terms. For this 30 year term, they protect SCE&G's loads within the two largest municipalities on its system and give the Company a strong assurance of continued load growth in the area. The loads these agreements protect are critical loads around which SCE&G's system has been built and without which it will not function efficiently. Also, by resolving these agreements the cost of supporting the Company's generation and transmission investments is shared by the customers in these cities – both customers existing today and future customers. Had these two cities left SCE&G's system and purchased their electric supply elsewhere, the system's remaining customers would likely have experienced significant rate increases.

# Q. DO YOU HAVE ANY OTHER COMMENTS REGARDING THIS FRANCHISE AGREEMENT ISSUE?

A. Yes. The regulatory policy issue surrounding these two franchise agreements is critical. It concerns whether the Commission will support these cities and the Company in their prudent and good faith efforts to resolve these franchise issues, protect the integrity of SCE&G's utility system, and promote an ongoing positive relationship between the cities and the Company. Whenever a utility is faced with the need to resolve

important, and politically-charged issues like those involved in these franchises, it must assess whether it will receive regulatory support of its actions. Moreover, the alternative to a negotiated agreement in cases such as these is often to maintain a bitter and unhealthy relationship between the entities. Such a relationship hurts both entities, and the public, in ways that are hard to quantify and could involve the Commission as arbitrator of these disputes.

I believe the public interest is best served when municipalities and the utilities that serve them act as partners to promote the well-being and development of the communities they serve. I would argue that the Commission should send a clear message to the Company and these two cities that the positive resolution of the issues surrounding their respective franchise negotiations was prudent, responsible, and in the long term interest of the cities and all the Company's ratepayers – those on the system today and those future customers.

### Q. DOES THIS CONCLUDE YOUR TESTIMONY?

17 A. Yes.

Julius A. "Chip" Wright is the President of J. A. Wright and Associates, 4705 Ponte Vedra Drive, Marietta, GA, 30067; 770-951-0894; jawright@mindspring.com.

## **Experience Overview**

Prior to starting his firm, Dr. Wright was a Client Partner for AT&T Solutions Utilities and Energy Practice and before that a Principal in EDS' Management Consulting Services. Dr. Wright has been consulting electric gas, and telephone utilities on regulation, economics, rates, production modeling and strategic planning for the past three years. Prior to this Dr. Wright served an eight-year term as a Utility Commissioner for the state of North Carolina. Prior to that he served three terms in the North Carolina State Senate while he was a senior project engineer for Corning Glass Works on their optical wave guide project in Wilmington, North Carolina. He has a total of 14 years' government-related experience, 12 years' plant-related engineering experience, and he has established two companies.

While serving on the North Carolina Utility
Commission, he served four years on the National
Association of Regulatory Utility Commissioners
(NARUC) Electricity Committee. He has served in
various other advisory capacities, including the
Keystone Committee on Externalities; the North
Carolina Radiation Protection Committee, and on an
Oversight Committee for a joint North Carolina/New
York/ Department of Energy (DOE) project.

Dr. Wright has also served on the Southern States Energy Board Task Force on Restructuring the Electric Utility Industry.

# **Electric Competition Natural Gas, and Regulatory Strategy**

 "Energy Deregulation," March 2001, report of the California State Auditor on the causes of the problems related to high electric prices and blackouts (from May, 2000 through June 2001, and ongoing) in California's restructured electric

# Exhibit \_\_\_(JAW-1)

- marketplace. Dr. Wright was one of three consultants who essentially researched and prepared the State Auditor's report.
- Principal author with Dr. Al Danielsen of "Reliability of Electric Supply In Georgia," published by The Bonbright Utilities Center, University of Georgia, June, 2001.
- Presented testimony before the North Carolina Public Utilities Commission on behalf of SCANA Corporation regarding issues related to market power in its merger with Public Service Company of North Carolina, Docket No. G-5, Sub 400; G-3, Sub 0.
- Was the principal author of a report and investigation titled "An Analysis of Commonwealth Edison's Planning Process For Achieving Reliability of Supply," which was an investigation of the Company's planning process to meet its statutory obligation for supplying electricity as Illinois transitions to a competitive retail electric market, Illinois Commerce Commission Docket No. 98-0514.
- Co-authored a national study that used computer modeling techniques to quantify the impact of electric competition on the aggregate economy in each of the 48 continental United States.
- Presented testimony to Louisiana Legislative Committee on behalf of Entergy Corporation regarding the various regulatory and technical issues that need to be addressed in the transition to competition.
- Presented testimony For Virginia Power with regard to its transition to competition plan.
- Testified before the Mississippi Public Service Commission on issues related to the establishment of retail electric competition, including ISO establishment, regional power exchanges, legislation, taxes and regulatory polices.

- Presented testimony for Entergy Corp. in both Louisiana and Arkansas in support of its transition to competition filing.
- Worked with three major southeastern utilities on developing business and regulatory strategy as they prepare for competition.
- Filed a report with the South Carolina Legislature that studied the impact of electric competition on the state of South Carolina.
- Was a panelist on a Southern Gas Association national televised forum on performance based regulation for the natural gas industry.
- Was the lead policy witness for South Carolina
   Electric and Gas on obtaining regulatory
   approval to transfer depreciation reserve from a
   nuclear plant to T&D depreciation reserve. This
   is a critical issue in preparing for competition and
   limiting stranded investment.
- Developed regulatory and marketing strategy for ENTERGY with regard to its telecommunications initiatives. In these efforts he worked with the EDS Telecommunications Consulting Group.
- Led an analysis of the prudence of Central Vermont Public Service Company's power and resource acquisitions over a five year period. The prudence of this utility's power supply strategy was under investigation in a rate case proceeding. Dr. Wright's team filed testimony supporting the Company and their efforts were instrumental in undermining the charges of imprudence brought by the Company's opposition.
- Developed an EDS intra-company task force to address the issues related to FERC's Transmission NOPR. This task force subsequently filed three responses to FERC's Open Access NOPR which provide a basis for EDS to maintain a leadership position as the electric utility industry undergoes restructuring to a competitive market.
- Helped develop a regulatory strategy and presented testimony on behalf of South Carolina

# Exhibit (JAW-1)

Pipeline. In this case, an economic analysis prepared by Dr. Wright and Dr. Frank Cronin (from EDS Economic Planning and Analysis Consulting Group) was presented along with recommendations. Their analysis and recommendations were generally accepted by the Commission staff.

#### Resource Planning & Economic Analysis

As a Commissioner he has been involved in a variety of resource planning issues including chairing the last North Carolina Resource Planning hearing that involved Duke Power Company, Carolina Power and Light, Virginia Power Company and the North Carolina Electric Membership Corporation.

He was also selected by the states of North Carolina and New York and the Department of Energy to be one of five representatives on a peer review panel overseeing a Resource Planning project being conducted by the Oak Ridge National Laboratories.

In addition to these initiatives Dr. Wright has:

- Was the principal author of a report and investigation titled "An Analysis of Commonwealth Edison's Planning Process For Achieving Reliability of Supply," which was an investigation of the Company's planning process to meet its statutory obligation for supplying electricity as Illinois transitions to a competitive retail electric market, Illinois Commerce Commission Docket No. 98-0514.
- Was the lead policy witness for South Carolina
   Electric and Gas on obtaining regulatory
   approval to transfer depreciation reserve from a
   nuclear plant to T&D depreciation reserve. This
   is a critical issue in preparing for competition and
   limiting stranded investment.
- Was instrumental in acquiring a large engagement for a major southeastern utility examining their competitive position as it relates to a competitive electric market. During the engagement he provided input and guidance on regulatory issues related to the deregulation of the electric industry.

- Assisted Carolina Power and Light Company in their integrated resource planning process by advising and facilitating a Commission directed public policy panel.
- Developed an overview of Niagara Mohawk Gas' integrated resource planning efforts. This engagement was under a contract from Oak Ridge National Laboratories.

# Management Reviews, Prudence Reviews, and Affiliate Issues

- Presented testimony before the Georgia Public Service Commission on behalf of Scana Energy Marketing related to affiliate relationships and the appropriate affiliate rules between Atlanta Gas Light Company's regulated and unregulated affiliates. Docket No. 146060-U, August 24, 2001.
- Provided input and draft testimony for Duke Power Company in support of a corporate restructuring initiative filed with the North Carolina Public Utility Commission in 2002.
   The draft testimony was used as a basis for oral testimony from the Company that supported the prudence and reasonableness of the Company's proposal.
- "Energy Deregulation," March 2001, report of the California State Auditor on the causes of the problems related to high electric prices and blackouts (from May, 2000 through June 2001, and ongoing) in California's restructured electric marketplace. Dr. Wright was one of three consultants who essentially researched and prepared the State Auditor's report.
- Presented testimony before the North Carolina Public Utilities Commission on behalf of SCANA Corporation regarding issues related to market power and the appropriate affiliate relationship protections necessary in its merger with Public Service Company of North Carolina, Docket No. G-5, Sub 400; G-3, Sub 0.
- Was the principal author of a report and investigation titled "An Analysis of Commonwealth Edison's Planning Process For

# Exhibit (JAW-1)

Achieving Reliability of Supply," which was an investigation of the Company's planning process to meet its statutory obligation for supplying electricity as Illinois transitions to a competitive retail electric market, Illinois Commerce Commission Docket No. 98-0514.

- Provided the initial drafts and helped develop final drafts of comments filed by Entergy Corporation in Mississippi and other states related to the appropriate protections with regard to the relationships between regulated and unregulated affiliates.
- Filed testimony supporting the prudence and reasonableness of Entergy Arkansas' Transition to Competition Filing, 1997.
- Filed testimony supporting the prudence and reasonableness of Entergy Louisiana's Transition to Competition Filing, 1997.
- Led an analysis and presented testimony related to the prudence of Central Vermont Public Service Company's power and resource acquisitions over a five year period. The prudence of this utility's power supply strategy was under investigation in a rate case proceeding. Dr. Wright's team filed testimony supporting the Company and their efforts were instrumental in undermining the charges of imprudence brought by the Company's opposition.

# Cost of Service, Rate Design, Forecasting

While serving more than eight years on the North Carolina Commission, Dr. Wright was involved in several cost of service and rate design analyses, testimonies, and orders. This included work in electric, telephone, gas, and water utilities. Additionally, he has presented testimony on performance based ratemaking and he has been involved in analyzing electric utility forecasting models, including end-use models, regression analysis (both linear and nonlinear) and customer discrete choice modeling forecasts. Furthermore, Dr. Wright's Ph.D. is in environmental and regulatory economics with special research into nonlinear minimal cost optimization procedures for electric

utility production models. This work included optimizing investments, optimal regulatory regimes, pricing, cost recovery, and rate of return issues.

In addition, he has:

- Provided an economic analysis of the proper regulatory regime for South Carolina Pipeline Company. In this analysis he presented testimony supporting performance based rate making and his recommendations were generally accepted by the Commission staff.
- Developed forecasted rates for two New York state utilities. These rates were developed to support a bond filing by a cogenerator.
- Provided a forecast of power payments from New York State Electric and Gas (NYSEG) to two independent power producers (IPPs). This forecast was used to estimate the level of overpayments by NYSEG to these IPPs, under PURPA regulations, which he used in a filing before FERC supporting the company's claim of unlawful overpayments.

#### **Telecommunications**

As a Commissioner he has regulated all types of telecommunications providers for eight years. In addition, he has worked with two electric utilities in strategy formulation in regard to their entering the telecommunications business. Furthermore, he has eight years experience as a fiber optic engineer.

## Other Areas of Expertise

Prior to joining EDS, he worked for eight years as a senior process engineer for Corning Glass in the design and production of optical waveguides (or fiber optics). Prior to that he worked for four years in the chemical industry as a process chemist and later as a senior project engineer. He has done work in environmental monitoring, process and product improvement, plant utilization, as well as starting and selling two successful companies — one in the financial leasing business and the other in the entertainment industry.

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#### **Presentations and Publications**

"Energy Deregulation," March 2001, report of the California State Auditor on the causes of the problems related to high electric prices and blackouts (from May, 2000 through June 2001, and ongoing) in California's restructured electric marketplace. Dr. Wright was one of three consultants who essentially researched and prepared the State Auditor's report.

"Low Cost States and Electric Restructuring - The Issue is the Price!" presented to the 1999 Miller Forum on Government, Business and the Economy, University of Southern California, April 19, 1999.

An Analysis of Commonwealth Edison's Planning Process For Achieving Reliability of Supply, Illinois Commerce Commission Docket No. 98-0514.

The Impact of Competition on the Price of Electricity, author, published by L. A. Wright and Associates, November, 1998.

"Retail Competition in the Electric Industry: The Impact on Prices," presented at the 18<sup>th</sup> Annual Bonbright Center Energy Conference, Atlanta, Georgia, Sept. 10, 1998.

Potential Economic Impacts of Restructuring the Electric Utility Industry, co-author, published by the Small Business Survival Committee, Washington, DC, November, 1997.

"How Deregulation Will Affect Power Quality and Energy Management," presented at the Power Quality and Energy Management Conference cosponsored by Entergy and EPRI, New Orleans, LA, Nov. 14, 1997.

"Deregulation of the Electric Industry," *Proceedings:* National Business Energy Forum, June 26, 1997, New Orleans, LA.

"A Different View of the Market," presented at the Southeastern Electric Exchange Conference, June 25, 1997, Charlotte, N.C.

"Restructuring The Electric Utility Industry: Theory vs. Reality," presented at the American Bar

Association Restructuring Conference, Raleigh, NC, Dec. 5, 1996.

"Restructuring: The Best Approach for Virginia," presented at the Virginia State Corporation Commission Electricity Restructuring Forum, Charlottesville, VA, Nov. 15, 1996.

"Alternative Rate Making for the Natural Gas Industry: State Issues," presented at the Tenth Annual NARUC Biennial Regulatory Information Conference, Columbus, Ohio, Sept. 12, 1996.

"RetailCo: To Regulate or Not?" presented at the 9<sup>th</sup> Annual Automatic Meter Reading Symposium, New Orleans, La., Sept. 10, 1996.

"Convergence: The Competitive Revolution Comes To Electric Power," presented to the Southeastern Association of Regulatory Commissioners Annual Convention, Point clear, Alabama, June 4,1996.

"Stranded Assets Recovery Issues," presented at the Western Electric Power Institute: Financial Forum, Tucson, Arizona, March 8, 1996.

"The Deregulation of the Electric Utility Industry: Current Status," presented at the North Carolina Economic Developers Association Midwinter Conference, Pinehurst, N.C., February 23, 1996.

"Performance Based Regulation for The Natural Gas Industry," panelist on Southern Gas Association's Televised Regulatory Forum, Dallas, Texas, Jan. 18, 1996.

"Industry Structure Should Meet Stakeholder Objectives," *Electric Light and Power*, Jan., 1996.

"Quantifying the Value of Stranded Investment: A Dynamic Modeling Approach," *Proceedings: Implementing Transmission Access and Power Transactions Conference*, Denver, Colorado, Dec. 14, 1995.

"Quantifying the Value of Stranded Investment: A Dynamic Modeling Approach," at the 15th Annual Bonbright Center Electric and Natural Gas Conference, October 9-11, 1995, Atlanta, Georgia.

## Exhibit (JAW-1)

Comments to FERC in the matter of Notice of Proposed Rulemaking on Open Access, Docket No. 95-9-000, 1995.

"The Road to Competition for Re-Regulated Industries," presented at the 1995 PROMOD users Forum, St. Petersburg, Florida, May 1, 1995.

"Comparing New York State Electric and Gas Corporation's Non-Utility Generator Payments to Current Avoided Cost Rates," report submitted in support of affidavit filed before FERC in Docket No. EL 95-28-000.

"A Solution To The Transmission Pricing and Stranded Investment Problems" *Public Utilities Fortnightly*, January 1995.

"Electric Utility Competition: The Winning Focus," presented at 1994 Southeastern Electric and Natural Gas Conference, Atlanta, Georgia, October 1994.

"Gas Integrated Resource Planning: The Niagara Mohawk Experience," for Martin Marietta Energy Systems, Inc., under contract to the United States Department of Energy, ORNL/SUB/93-03369.

"Future Regulation In the Water Industry - Can We Solve the Problems Before They Happen?" *Water*, Vol. 29, No. 2, pp. 14-17, Summer 1988.

"The Regulatory Process - Historical and Today," presented at Carolina Power and Light Company's IRP Public Participation Committee Seminar, June 1994.

"The Regulatory Role In DSM: Who Pays?" presented at Carolina Power and Light Company's IRP Public Participation Committee Seminar, June 1994.

"The Regulatory Process In North Carolina," North Carolina Telephone Association, June 1991.

#### **Testimony**

 Presented testimony before the Georgia Public Service Commission on the appropriate range for a return on equity earnings band (a form of

- performance based regulation) to set in a Savannah Electric & Power Company rate case, Docket No. 14618-U, April, 2002.
- Presented testimony before the Georgia Public Service Commission on the appropriate range for a return on equity earnings band (a form of performance based regulation) to set in a Georgia Power Company rate case, Docket No. 14000-U, November 19, 2001.
- Presented testimony before the Georgia Public Service Commission on behalf of Scana Energy Marketing related to affiliate relationships and the appropriate affiliate rules between Atlanta Gas Light Company's regulated and unregulated affiliates. Docket No. 146060-U, August 24, 2001.
- Presented testimony before the North Carolina Public Utilities Commission on behalf of SCANA Corporation regarding issues related to market power the appropriate affiliate relationship protections necessary in its merger with Public Service Company of North Carolina, Docket No. G-5, Sub 400; G-3, Sub 0.
- Presented testimony before the South Carolina Public Service Commission on behalf of South Carolina Pipeline Corporation regarding issues related to its annual review of gas costs as reflected in its purchase gas adjustment charge, Docket No. 1999-007-G, September, 1999.
- Presented testimony before the Arkansas Public Service Commission on behalf of Entergy Arkansas, Inc. regarding regulatory policies related to the definition of public utilities as it impacts citing requirements of non-utility owned generating facilities, Dockets No. 98-337-U, March 9, 1999.
- Presented Rebuttal and Surrebuttal testimony before the Louisiana Public Service Commission on behalf of Entergy Louisiana, Inc. and Entergy Gulf States regarding regulatory policies related to stranded cost recovery and on the issue of whether investors have been compensated for the risk of not recovering stranded costs, Dockets Nos. U-22092SC and U-20925, September, 1998.

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- Presented testimony to the South Carolina Public Utility Commission for South Carolina Pipeline Corp. related to acquisition adjustments and regulatory policies related to performance based regulation, Docket No. 90-588-G, June, 1998.
- Testified before the Mississippi Public Service Commission on issues related to the establishment of retail electric competition, including ISO establishment, regional power exchanges, legislation, taxes and regulatory polices, April 16, 17, 1997.
- Support of Transition Proposals filed by Virginia Power Corporation, March, 1997.
- Entergy Arkansas testimony in support of Transition to Competition Filing, 1997.
- Entergy Louisiana testimony in support of Transition to Competition Filing, 1997.
- Support of Performance Based Regulation for GTE South Inc., Docket No. P-19, Sub 277, before the North Carolina Utility Commission, filed Nov. 22, 1995.
- Stranded Cost Regulatory Policy and Recovery Testimony before the South Carolina Public Service Commission, the Commission approved the request Dr. Wright was advocating, Docket No. 95-1000-E, October 27,1995.
- Performance based rate making mechanism and rate levels, testimony on behalf of South Carolina Pipeline Corporation, Docket No. 90-588-G, filed August 3, 1995.
- Prudence Review of Power Resource Planning for Central Vermont Public Service Company, Docket No. 5724, September 7, 1994.
- Rebuttal testimony on behalf of Central Vermont Public Service Company, Docket 5724, September 7, 1994.
- Surrebuttal testimony on behalf of Central Vermont Public Service Company, Docket No. 5724, September 9, 1994.

#### **Education**

Dr. Wright received a Ph.D. in Economics from North Carolina State University, focusing on regulatory and environmental economics, and is a member of the honor society.

He received an MBA in finance from Georgia State University in 1978, graduating with honors.

He received a Master of Economics from North Carolina State University in 1991 and was a member of the honor society.

# Exhibit \_ (JAW-1)

He received a B.S. in Chemistry from Valdosta State College in Valdosta, Georgia, graduating Magna Cum Laud.

In addition, he has completed the Michigan State University Regulatory Course, several other NARUC courses on regulation, been an instructor on regulatory issues at several NARUC courses, completed management courses at Corning Glass and financial seminars at Bank Boston and Merrill Lynch dealing with regulation.